

RECEIVED

TO: Facility Name: Litton Instruments & Life Support

Address: Hickory Grove Road, P.O. Box 4508

DEC 04 1991

Davenport, IA 52808-4508

TR/da

EPA ID Number: IAD005268420

Date: 11/19/20/91 IOWA SECTION

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

Citation

Description of Violation

<u>Permit II C 4</u>	- Failure to maintain adequate aisle space in hazardous waste storage area (40 CFR 264.35)
<u>Permit III B 5</u>	- Failure to separate drums containing incompatible hazardous wastes in the haz. waste storage area (40 CFR 264.17(c))
<u>Permit III B 3</u>	- Hazardous waste stored in a leaking drum in Haz. waste container storage area (40 CFR 264.173(b))
<u>Permit Atch. II F-9</u> <u>40 CFR 262.34</u>	- Unlabeled drums containing hazardous waste (0002) in Haz. waste container storage area (40 CFR 262.34)
<u>Permit II C 3 (b)</u>	- No device, such as a telephone or two-way radio in haz. waste storage area (40 CFR 264.32(b)). Also no
<u>Permit I H 1(b)</u>	device available when one employee is on premises (40 CFR 264.34(b))
<u>Permit I E</u>	- No Haz. waste training record for two employees (Rudy Claussen & Jim Klemme) (40 CFR 264.16(a)(1))

This notice is provided to call your attention to those areas of noncompliance at the earliest possible time. This notice does not constitute a compliance order (Administrative Civil Complaint) issued pursuant to Section 3008 of RCRA and may not be a complete listing of all violations which may be identified as a result of this inspection.

The Litton ILS Facility is hereby requested to submit in writing within 10 days of receipt of this notice a description of all corrective actions taken and/or a schedule for completion of necessary correction actions to be taken to: Mike Sanderson, Chief, RCRA Branch, U. S. Environmental Protection Agency, Region VII, 726 Minnesota Ave., Kansas City, Kansas, 66101. The corrective actions taken by Litton ILS will be considered in subsequent enforcement follow-up. Should civil penalties be assessed, corrective action(s) will be considered in assessing the penalty amount.

If you have any questions on this Notice or wish to discuss your response, you may call Tran Tran (U. S. EPA) at (913) 551-7884, or Ken Herstowski, (USEPA), at (913) 551-_____.

This Notice prepared by Michael D. MacLeod Date: 11/20/91

The undersigned person hereby acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: RICHARD SEGERQUIST Date: 11/20/91
Signature: Richard Segerquist
Title: MGR-SAFETY, HEALTH & ENV.



R00337171
RCRA RECORDS CENTER

TO: Facility Name: Litton Instruments & Life Support
Address: Hickory Grove Road, P.O. Box 4508
Davenport, IA 52808-4508
EPA ID Number: IAD05268420 Date: 11/19, 20/91 TR 104

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

<u>Citation</u>	<u>Description of Violation</u>
<u>Permit II J 1 (a)</u>	- Failure to include haz. wastes physical form, process, estimated weight, volume, and density; method handling code. (40 CFR 264 App I (1)(2)(3)).
<u>40 CFR 262.11 (c) (Permit II B)</u>	- Failure to determine if the following are hazardous wastes with respect to TCLP: <u>amphibols</u> • <u>Lapping wastes oils</u> • <u>Waste oils</u> • <u>Water soluble cutting fluids</u> • <u>Nickel Plating wastes in Satellite Acc. Area</u> • <u>Waste acids in Storage area - Stored over 1 year</u> • <u>Sando-Fix (Nickel Acetate) - Manifest # WJ5192749 (8/20/91)</u> • <u>Paint waste in Paint Spray booth and Spray booth filters</u>
<u>Permit III A. 1.</u>	- <u>Storage of Hazardous waste (Freon TF) in storage area which is not included in the permit.</u>

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Printed Name: RICHARD SEDERQUIST Date: 11/20/91
Signature: Richard Sederquist
Title: MGR. SAFETY HEALTH & ENV.

Notice of Violation Pursuant to Requirements
of the Resource Conservation and Recovery Act (RCRA)

Page 3 of 4

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Address: Hickory Grove Road, PO Box 4508
Davenport, IA 52808-4508
EPA ID Number: IAD005268420 Date: 11/19/20/91

During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

Citation	Description of Violation
Permit II B.	- Improper Waste designation ^{made 11/20} on LDR notice for identification of corresponding treatment standard (40CFR 268.7(a)(1)(i)) on the following manifests: IL 3020543 (Aug. 3, 1990); and IL 3020542 (Mar. 16, 1990)
40CFR 262.11(C) (Permit II B)	- Failure to determine if waste (Lapping Sludge) is a haz. waste with respect to TCLP prior to shipment off site (IL 5008264, 6/23/89)
Permit II J. 1 (b)	- Failure to include manifest document number in operating record for wastes shipped off site (Manifest # IL 5008264, 6/23/89).
Permit II J. 1 (c)	- Failure to include records and results of waste analyses performed in the operating record. (40CFR 264.73(b)(3)).
Permit III A. 2. (40CFR 264.5)	- Storage of hazardous waste over 90 days in a non-permitted area - Waste paints, lacquers, acids, primers , film developing chemicals, ^{adhesives} etc.
40CFR 262.11(C) (Permit II B)	- Failure to determine as hazardous wastes the waste paints, ^{adhesives} lacquers, primers, acids etc. in oil house storage area - Dept. 910

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During an inspection just completed to determine compliance with the requirements of Subtitle C of RCRA and regulations promulgated pursuant thereto, the following violations were identified:

<u>Citation</u>	<u>Description of Violation</u>
<u>40CFR 262.34(C)(1)(i)</u>	<u>- Failure to close containers holding hazardous waste in Satellite Accumulation areas (40CFR 262.34(C)(1)(i))</u>
<u>Permit II D. 1, 3</u>	<u>- Failure to comply with General Inspection Requirements in regards to leaking drum, damaged drums, and improper aisle space in haz. waste storage area - these items were not included in inspection reports.</u>
<u>Permit II D 2</u>	<u>- Failure to keep additional 55-gal(2) and 83-gal(2) drums in hazardous waste storage area as specified in the Safety and emergency Equipment Inspection log sheet.</u>
<u>40CFR 268.50 c</u>	<u>- Failure to prove that storage of hazardous waste (Freon) in haz. waste storage area is not being stored for purpose of accumulation</u>
<u>40CFR 265.174</u>	<u>- Failure to inspect Freon Satellite Accumulation in oil house and small container waste storage in Dept. 910</u>

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Permit III B 3	- Hazardous waste stored in a leaking drum in haz waste container storage area (40 CFR 264.173(b))
Permit Atch. II F-9 40 CFR 262.34	- Unlabeled drums containing hazardous waste (0002) in haz waste container storage area (40 CFR 262.34)
Permit II C 3 (b)	- No device, such as a telephone or two way radio in haz waste storage area (40 CFR 264.32(b)). Also no device available when one employee is on premises (40 CFR 264.34(b))
Permit I H 1(b)	- No haz waste training record for two employees (Rud Clauson & Jim Klenow) (40 CFR 264.16(a)(1))
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Permit III A. 2. (40CFR 265)	- Storage of hazardous waste over 90 days in a non-permitted area - Waste paints, lacquers, acids, etc. in oil house storage area - Dept. 910
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